

**AgSaver, LLC
PO Box 121
McGehee, AR 71654**

May 30, 2012

VIA FAX

Document Processing Desk (COADR)
Attention: Kathleen O'Malley
U.S. Environmental Protection Agency
Office of Pesticide Programs
Room S4900, One Potomac Yard
2777 Crystal Drive
Arlington, VA 22202

FAX: 703-305-7670

**Re: Change in Authorized Company Representative for AgSaver, EPA
Company Number 83772**

To Whom It May Concern:

This letter authorizes the following firm to act as our authorized agent in all pesticide registration matters. This authorization shall take effect immediately.

Sullivan & Worcester LLP
1666 K Street, NW, Suite 700
Washington, DC 20006
202-775-1200

If you have any questions, please call me at (870) 222-5343. Thank you.

Sincerely,



Clarke Pugh

203 East Ash Street
McGehee, AR 71654

cc: Janine Gydus, Sullivan & Worcester LLP

United States Environmental Protection Agency
Washington, D.C. 20460
DATA CALL-IN RESPONSE

OMB Approval 2070-0174

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form.
Use additional sheet(s) if necessary.

1. Company Name and Address AGSAVER, LLC c/o Sullivan & Worcester LLP 1666 K Street, NW, Suite 700 Washington, DC 20006		2. Case # and Name 2375 - Mepiquat chloride Chemical # and Name: 109101 Mepiquat chloride		3. Date and Type of DCI and Number 13-Feb-2013 GENERIC ID # GDCI-109101-1212	
4. EPA Product Registration	5. I wish to cancel this product registration voluntarily	6. Generic Data		7. Product Specific Data	
		6a. I am claiming a Generic Data Exemption because I obtain the active ingredient from the source EPA registration number listed below.	6b. I agree to satisfy Generic Data Requirements as indicated on the attached form entitled "Requirements Status and Registrant's Response."	7a. My product is an MUP and I agree to satisfy the MUP requirement on the attached form entitled "Requirements Status and Registrant's Response."	7b. My product is an EUP and I agree to satisfy the EUP requirement on the attached form entitled "Requirements Status and Registrant's Response."
83772-1			X	N/A	N/A
8. Certification: I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law. Signature and Title of Company's Authorized Representative <u>Clara R. Member</u>				9. Date 6/17/13	
10. Name of Company AgSaver, LLC				11. Phone Number 870-222-5343	

United States Environmental Protection Agency
Washington, D.C. 20460
REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

OMB Approval 2070-0174

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1. Company Name and Address AGSAVER, LLC c/o Sullivan & Worcester LLP 1666 K Street, NW, Suite 700 Washington, DC 20006		2. Case # and Name 2375 - Mepiquat chloride Chemical # and Name: 109101 Mepiquat chloride			3. Date and Type of DCI and Number 13-Feb-2013 GENERIC ID # GDCI-109101-1212				
4. Guideline Requirement Number	5. Study Title	P R O T O C O L	Progress Reports			6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response
			1	2	3				
	Environmental Fate Data Requirements (Conventional Chemical)								
835.4300	Aerobic aquatic metabolism	N				R	TGAI	24	3
835.4400	Anaerobic aquatic metabolism	N				R	TGAI	24	3
835.6100	Terrestrial field dissipation (3)	N				R	TGAI	24	3
	Toxicology Data Requirements (Conventional Chemical)								
870.3465	90-day inhalation toxicity (1, 4)	N				R	TGAI	24	3
870.7800	Immunotoxicity	N				R	TGAI	12	3
850.4225	Seedling emergence, Tier II (2, 5)	N				R	TEP	12	3
850.4250	Vegetative vigor, Tier II (2, 5)	N				R	TEP	12	3
10. Certification: I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law.							11. Date		
Signature and Title of Company's Authorized Representative <u>Charles Rfr Member</u>							6/17/13		
12. Name of Company AgSaver, LLC							13. Phone Number 870-222-5343		



United States Environmental Protection Agency
Washington, D.C. 20460
CERTIFICATION OF ATTEMPT TO ENTER INTO AN
AGREEMENT WITH REGISTRANTS FOR
DEVELOPMENT OF DATA

Form Approved.

OMB Nos. 2070-0057;
2070-0107; 2070-0122;
2070-0164

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 15 minutes per response including time for reading the instructions, searching existing data sources, gathering and maintaining the data needed and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, Collection Strategies Division (2822T), U.S. Environmental Protection Agency, 1200 Pennsylvania Avenue, N.W., Washington, DC 20460. Do not send the form to this address.

Please fill in blanks below

Company Name

AgSaver, LLC

Company Number

83772

Chemical Name

Mepiquat Chloride

EPA Chemical Number

109101

I Certify that:

My company is willing to develop and submit the data required by EPA under the authority of the Federal Insecticide, Rodenticide and Fungicide Act (FIFRA), if necessary. However, my company would prefer to enter into an agreement with one or more registrants to develop jointly or share in the cost of developing data.

My firm has offered in writing to enter into such an agreement. That offer was irrevocable and included an offer to be bound by arbitration under section 3(c)(2)(B)(iii) of FIFRA if final agreement on all terms could not be reached otherwise. This offer was made to the following firm(s) on the following date(s):

Name of Firm(s)

- (1) Celsius Property B.V., Amsterdam (NL); (6) Bayer CropScience LP
(2) CP BIO, Inc. (7) Arysta LifeScience North America, LLC
(3) Nufarm USA, Inc. (8) Albaugh Inc.
(4) Tacoma Ag, LLC (9) Drexel Chemical Company
(5) BASF Corporation (10) Willowood Mepiquat Chloride, LLC

Date of Offer

5/28/2013

Certification:

I certify that I am duly authorized to represent the company name above, and that the statements that I have made on this form and all attachments therein are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature of Company's Authorized Representative

Clarke Pugh

Date

6/17/13

Name and Title (Please Print or Type)

Clarke Pugh, Member

Confidential Statement of Formula may be entitled to confidential treatment



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instruction and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington DC 20460. Do not send the form to this address.

DATA MATRIX

Date: May 31, 2013	EPA Reg No./ File Symbol 83772-1	Page 1 of 2
Applicant's/Registrant's Name and Address: AgSaver, LLC 203 E. Ash Ave. McGehee, AR 71654	Product: AgSaver Mepiquat Chloride Technical	
Ingredient: Mepiquat Chloride		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
Studies Required by Generic	DCI-109101-1212 of 2/13/2013:				
835.4300	Aerobic Aquatic Metabolism	NA	TBD	PAY	
835.4400	Anaerobic Aquatic Metabolism	NA	TBD	PAY	
835.6100	Terrestrial Field Dissipation	NA	TBD	PAY	
850.4225	Seedling Emergence, Tier II	NA	TBD	PAY	
850.4250	Vegetative Vigor, Tier II	NA	TBD	PAY	
870.3465	90-Day Inhalation Toxicity	NA	TBD	PAY	
870.7800	Immunotoxicity	NA	TBD	PAY	

Signature 	Name and Title Robert G. Butz, Authorized Agent for AgSaver, LLC Sullivan & Worcester LLP	Date 5/31/2013
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Ingredient: Mepiquat Chloride		

Offer to Pay Letters have been sent to the following companies for cost sharing for the seven studies listed above:

Albaugh Inc.

Drexel Chemical Company

Arysta LifeScience North America, LLC

Willowood Mepiquat Chloride, LLC

Celsius Property B.V., Amsterdam (NL)
Makhteshim Agan of North America, Inc.

CP BIO, Inc.

NUFARM USA, INC.

TACOMA AG, LLC

BASF Corporation

Bayer Cropscience LP

Signature 	Name and Title Robert G. Butz, Authorized Agent for AgSaver, LLC Sullivan & Worcester LLP	Date 5/31/2013
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Ingredient: Mepiquat Chloride		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
Studies Required by Generic	DCI-109101-1212 of 2/13/2013:				
			TBD	PAY	
			TBD	PAY	
			TBD	PAY	
			TBD	PAY	
			TBD	PAY	
			TBD	PAY	

Signature 	Name and Title Robert G. Butz, Authorized Agent for AgSaver, LLC Sullivan & Worcester LLP	Date 5/31/2013
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